

Application No.: 09/970,741  
Response to OA dated: September 23, 2004  
Response dated: January 6, 2005

### **Remarks**

The above Amendments and these Remarks are in reply to the Office Action mailed September, 23, 2004. A Petition for Extension of Time to Respond is also submitted herewith, together with the appropriate fee. A replacement copy of the Oath/Declaration is also submitted herewith.

#### **I. Summary of Examiners Rejections**

Prior to the Office Action mailed September 23, 2004, claims 1-25 were pending in the Application. In the Office Action mailed September 23, 2004, Claims 3, 15 and 25 were rejected under 35 U.S.C. 112, second paragraph, as being indefinite. Claims 1-9 and 13-21 were rejected under 35 U.S.C. 102(b) as being anticipated by Keller et al. (U.S. Patent No. 6,212,672, hereafter Keller). Claims 10-12 and 22-25 were rejected under 35 U.S.C. 103(c) as being unpatentable over Keller in view of GNAT Compiler Components (hereafter GNAT).

The Examiner also requested that Applicant submit a new Oath/Declaration, since only two of the six pages apparently exist in the application electronic file wrapper. The Examiner also requested that Applicant update the priority information on Page 1 of the Specification.

#### **II. Summary of Applicants' Amendment**

The present Response amends the Specification. The present Response also amends Claims 1, 3, 5, 6, 13,15 and 25; and adds Claims 26-27, leaving for the Examiner's present consideration Claims 1-27. Reconsideration of the application, as amended, is respectfully requested. Applicant reserves the right to prosecute any originally presented claims in a continuing or future application.

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**III. Specification**

The Specification has been amended to include the appropriate priority and cross-reference information. Applicant respectfully submits that the proposed amendments are to correct various informalities in the Specification, and that no new matter is being added.

**IV. Claim Rejections under 35 U.S.C. § 112**

In the Office mailed September 23, 2004, claims 3, 15 and 25 were rejected under 35 U.S.C. 112 as being indefinite. Accordingly, Claims 3, 15 and 25 have been amended by the current Response to correct the various informalities. Applicant respectfully submits that the claims as amended now properly conform to the requirements of 35 U.S.C. 112, and reconsideration thereof is respectfully requested.

**V. Claim Rejections under 35 U.S.C. § 102(b)**

In the Office Action mailed September 23, 2004, claims 1-9 and 13-21 were rejected under 35 U.S.C. 102(b) as being anticipated by Keller.

**Claim 1**

Claim 1 has been amended by the current Response to more clearly define the embodiment of the invention therein. As amended, Claim 1 defines:

1. *(Currently Amended) A system for code generation from a software application design product source data, comprising:*

*a data navigation layer that interfaces with, and provides navigational access to, a software application design product source data, wherein said data navigation layer provides navigation inside the source data via a combination of pointers to the source data;*

*a template that specifies instructions to drive a code generation process that is applied to said source data;*

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*a parser that parses said template in accordance with specified rules, filters, and conditions, and accesses the source data via the pointers of the data navigation layer, to generate code, wherein said specified rules implement the template instructions, and wherein said filters are used to transform data; and,*

*a code output mechanism that outputs said generated code.*

Claim 1, as currently amended, defines a system for code generation from a software application design product source data, including a data navigation layer that interfaces with, and provides navigational access to, a software application design product source data; a template that specifies instructions to drive a code generation process; and a parser that parses said template in accordance with specified rules, and accesses the source data via the data navigation layer. Applicant respectfully submits that these features are not disclosed by the cited references.

Keller discloses a software development tool system with an executable working model in an interpretable intermediate modeling language. Keller apparently discloses a tool that utilizes an intermediate object modeling language to generate source code. The structure of the desired program is first described graphically by generating rule diagrams, state diagrams, event diagrams and other object diagrams. The tool employs these diagrams to generate a working model of the program expressed in the object modeling language. Source code is then generated from the object modeling language and compiled to create the final program. (Abstract).

It appears from the above description that Keller requires the tool to generate an intermediate modeling language from the desired program structure (i.e. from the rule diagrams, state diagrams, event diagrams and other object diagrams). This intermediate modeling language is subsequently used by the interpreter in generating the program's source code. However in the embodiment of the invention as defined by Claim 1, there is no intermediate modeling language of the source data. Instead, a data navigation layer interfaces with, and provides navigational access to, a software application design product source data. The data navigation layer provides navigation inside the data source via a combination of pointers to the source data, thus isolating the parser from the source data. During code generation, the parser accesses the source data via these pointers in

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order to generate code. As such, the data navigation layer allows for pointers to use the source data, without the need for generation of an intermediate modeling language.

Furthermore, Keller discloses that the information represented in the object modeling language is interpreted by the interpreter. The interpreter analyzes an OML database and performs various actions associated with the meaning of the object models, including building additional objects and executing rules and expressions. The execution is based on the current set of associations in the OML database. (Column 16, Lines 37-46).

The above description suggests that, in Keller, the interpreter accesses the rules that are generated by the tool in creating the OML database. However, it does not appear to parse the rule diagrams, state diagrams, or object diagrams etc., according to these rules. This suggests that, in Keller, the rules used by the interpreter are generated during the code generation process, and have not been previously specified. However, in the embodiment of the invention as defined by Claim 1, the parser parses the template in accordance with specified rules. Since, in accordance with the present invention, the rules are specified, they can be easily modified.

The advantage of the system defined by Claim 1 includes that it provides a data navigation layer isolating the parser from data sources for code generation, without having to rely on an intermediate modeling language such as is disclosed in Keller. This isolation allows the framework to be independent of the specific data source implementations.

In view of the above comments, Applicant respectfully submits that Claim 1 is neither anticipated by, nor obvious in view of the cited references, and reconsideration thereof is respectfully requested.

### **Claim 13**

The comments provided above with respect to Claim 1 are hereby incorporated by reference. Claim 13 has been similarly amended to more clearly define the embodiment of the invention therein. Applicant respectfully submits that the embodiment defined by Claim 13, as amended, is neither anticipated by, nor obvious in view of the cited references, and respectfully requests reconsideration of the claim.

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### **Claims 2-9 and 14-21**

Claims 2-9 and 14-21 are not addressed separately but it is respectfully submitted that these claims should be allowable as depending from an allowable independent claim and further in view of the comments provided above. Applicant respectfully submits that Claims 2-9 and 14-21 are similarly neither anticipated by, nor obvious in view, of the cited references, and reconsideration thereof is respectfully requested.

It is also submitted that these claims also add their own limitations which render them patentable in their own right. Applicant reserves the right to argue these limitations should it become necessary in the future.

### **VI. Claim Rejections under 35 U.S.C. § 103(c)**

In the Office Action mailed September 23, 2004, claims 10-12 and 22-25 were rejected under 35 U.S.C. 103(c) as being unpatentable over Keller in view of GNAT.

### **Claims 10-12 and 22-25**

Claims 10-12 and 22-25 are not addressed separately but it is respectfully submitted that these claims should be allowable as depending from an allowable independent claim and further in view of the comments provided above. Applicant respectfully submits that Claims 10-12 and 22-25 are similarly neither anticipated by, nor obvious in view, of the cited references, and reconsideration thereof is respectfully requested.

It is also submitted that these claims also add their own limitations which render them patentable in their own right. Applicant reserves the right to argue these limitations should it become necessary in the future.

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**VII. Additional Amendments**

**Claims 26 and 27**

Claims 26 and 27 have been newly added by the present Response. Applicant respectfully requests that new Claims 26 and 27 be included in the Application and considered therewith.

**VIII. Conclusion**

In view of the above amendments and remarks, it is respectfully submitted that all of the claims now pending in the subject patent application should be allowable, and reconsideration thereof is respectfully requested. The Examiner is respectfully requested to telephone the undersigned if he can assist in any way in expediting issuance of a patent.

The Commissioner is authorized to charge any underpayment or credit any overpayment to Deposit Account No. 06-1325 for any matter in connection with this response, including any fee for extension of time, which may be required.

Respectfully submitted,

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